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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACK HORSLEY,

Defendant.

No. 3:22-cr-00071-SLG-MMS

COUNT 1:
DISTRIBUTION OF A CONTROLLED
SUBSTANCE
Vio. of 21 U.S.C. § 841(a)(1), (b)(1)(A)

COUNT 2:
USE OF A FIREARM IN
FURTHERANCE OF A DRUG
TRAFFICKING CRIME
Vio. of 18 U.S.C. § 924(c)

COUNT 3:
FELON IN POSSESSION OF
FIREARMS
Vio. of 18 U.S.C. §§ 922(g)(1) and
924(a)(2)

COUNT 4:
POSSESSION OF CONTROLLED
SUBSTANCES WITH INTENT TO
DISTRIBUTE
Vio. of 21 U.S.C. § 841(a)(1), (b)(1)(B)

ENHANCED STATUTORY
PENALTIES ALLEGATION:

21 U.S.C. § 841(b)(1)(A)

CRIMINAL FORFEITURE

ALLEGATION 1:

21 U.S.C. § 853 and Rule 32.2(a)

CRIMINAL FORFEITURE

ALLEGATION 2:

18 U.S.C. § 924(d), 28 U.S.C. §
2461(c), and Rule 32.2(a)

I N D I C T M E N T

The Grand Jury charges that:

COUNT 1

On or about December 10, 2020, within the District of Alaska, the defendant, JACK HORSLEY, knowingly and intentionally distributed a controlled substance, to wit: 50 grams or more of pure methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A).

COUNT 2

On or about December 10, 2020, within the District of Alaska, the defendant, JACK HORSLEY, did knowingly possess a firearm in furtherance of the drug trafficking crime charged in Count 1.

All of which is in violation of 18 U.S.C. § 924(c)(1)(A)(i).

COUNT 3

On or about December 10, 2020, within the District of Alaska, the defendant, JACK HORSLEY, knowingly having been convicted of crimes punishable by imprisonment for

a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, firearms, to wit:

1. Norinco Rifle, Model: SKS, Caliber: 7.62x39
2. Hi-Point Pistol, Model: JHP, Caliber: .45
3. Ruger Pistol, Model: Mark I, Caliber: .22
4. Remington Rifle, Model: 572, Caliber: .22
5. Winchester Shotgun, Model: 1912, Caliber: 12
6. Winchester Rifle, Model: 1917, Caliber: .30
7. Ruger Frame, Model: M77R, Caliber: 220 Swift
8. Parker-Hale LTD Rifle, Model: Unk, Caliber: .270
9. Colt Pistol, Model: Target Model, Caliber: .22
10. Lames Shotgun, Model: Chaivari, Caliber: 12
11. Remington Shotgun, Model: 870, Caliber: 12

Prior Conviction

<u>Conviction Date</u>	<u>Offense</u>	<u>Court</u>	<u>Case No.</u>
April 7, 2009	Third Degree Misconduct Involving Controlled Substance	Superior Court for the State of Alaska	3KN-08- 55CR

All of which is in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

COUNT 4

On or about December 11, 2020, within the District of Alaska, the defendant, JACK HORSLEY, knowingly and intentionally possessed with intent to distribute controlled substances, to wit:

(1) 100 grams or more of a mixture or substance containing a detectable amount of heroin; and

(2) 5 grams or more of methamphetamine.

All of which is in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B).

ENHANCED STATUTORY PENALTIES ALLEGATION

Before the defendant, JACK HORSLEY, committed the offenses charged in Counts 1 and 4, he had a final conviction entered in the Superior Court for the State of Alaska in case 3KN-08-55CR for a serious drug felony, Third Degree Misconduct Involving Controlled Substance, Alaska Statute § 11.71.030(a)(1), for which he served a term of imprisonment of more than 12 months and for which his release from such term of imprisonment was within 15 years of the commencement of the offense charged in Counts 1 and 4.

All pursuant to 21 U.S.C. § 841(b)(1)(A).

CRIMINAL FORFEITURE ALLEGATION 1

Upon conviction of the offenses alleged in Count 1 or Count 4 of this Indictment, the defendant, JACK HORSLEY, shall forfeit to the United States any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$18,634 in United States Currency
2. Royal Sovereignty Money Counter, Model RBC100BK

3. Norinco Rifle, Model: SKS, Caliber: 7.62x39, Serial #: 016902
4. Hi-Point Pistol, Model: JHP, Caliber: .45, Serial #: X435548
5. Ruger Pistol, Model: Mark I, Caliber: .22, Serial #: 182608
6. Winchester Shotgun, Model: 1912, Caliber: 12, Serial #: 212304
7. Winchester Rifle, Model: 1917, Caliber: .30, Serial #: 75693
8. Ruger Frame, Model: M77R, Caliber: 220 Swift, Serial #: 77-74538
9. Parker-Hale LTD Rifle, Model: Unk, Caliber: .270, Serial #: R-86650
10. Lames Shotgun, Model: Chaivari, Caliber: 12, Serial #: 2466
11. Remington Shotgun, Model: 870, Caliber: 12, Serial #: V824339V
12. All related magazines and ammunition

All pursuant to 21 U.S.C. § 853 and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

CRIMINAL FORFEITURE ALLEGATION 2

Upon conviction of the offenses alleged in Count 2 or Count 3 of this Indictment, the defendant, JACK HORSLEY, shall forfeit to the United States any firearms and ammunition used in knowing violation of the offenses, including but not limited to the following:

1. Norinco Rifle, Model: SKS, Caliber: 7.62x39, Serial #: 016902
2. Hi-Point Pistol, Model: JHP, Caliber: .45, Serial #: X435548
3. Ruger Pistol, Model: Mark I, Caliber: .22, Serial #: 182608
4. Winchester Shotgun, Model: 1912, Caliber: 12, Serial #: 212304
5. Winchester Rifle, Model: 1917, Caliber: .30, Serial #: 75693

6. Ruger Frame, Model: M77R, Caliber: 220 Swift, Serial #: 77-74538
7. Parker-Hale LTD Rifle, Model: Unk, Caliber: .270, Serial #: R-86650
8. Lames Shotgun, Model: Chaivari, Caliber: 12, Serial #: 2466
9. Remington Shotgun, Model: 870, Caliber: 12, Serial #: V824339V
10. All related magazines and ammunition

All pursuant to 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Seth Brickey
SETH BRICKEY
Assistant United States Attorney
United States of America

s/ Kathryn Vogel for
S. LANE TUCKER
United States Attorney
United States of America

Date: 9-20-22